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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

UNITED STATES OF AMERICA,)	NO. CR 20-00101 VKD
)	
Plaintiff,)	STIPULATION TO CONTINUE STATUS
)	CONFERENCE FROM MARCH 25, 2020 TO MAY
v.)	21, 2020 AND [PROPOSED] ORDER
)	
ANDREW JAMES WATTS,)	
)	
Defendant.)	
)	
)	

In response to the public health guidance involving Novel Coronavirus (COVID-19), and in consideration of ongoing defense investigation and effective preparation, counsel for defendant and the United States respectfully request that this Court continue the status conference from March 25, 2020 to May 21, 2020.

The parties further stipulate and agree that the period of time from March 25, 2020 to May 21, 2020 should be excluded from the calculations under the Speedy Trial Act for effective preparation of counsel and in the interest of justice.

1 IT IS SO STIPULATED.

2 DATED: March 17, 2020

/s/

DANIEL KALEBA

Assistant United States Attorney

4 DATED: March 17, 2020

/s/

ALAN LAGOD

Counsel for Defendant Watts

7 **[PROPOSED] ORDER**

8 Based upon the facts set forth in the stipulation of the parties and for good cause shown, the
9 status conference scheduled on March 25, 2020 is continued to May 21, 2020 at 1:30 p.m. The Court
10 finds that failing to exclude the time from March 25, 2020 through May 21, 2020 would unreasonably
11 deny defense counsel and the defendant the reasonable time necessary for effective preparation, taking
12 into account the exercise of due diligence. 18 U.S.C. § 3161(h)(7)(B)(iv). The Court further finds that
13 the ends of justice served by excluding the time from March 25, 2020 through May 21, 2020 from
14 computation under the Speedy Trial Act outweigh the best interests of the public and the defendant in a
15 speedy trial. Therefore, and with the consent of the parties, IT IS HEREBY ORDERED that the time
16 from March 25, 2020 through May 21, 2020 shall be excluded from computation under the Speedy Trial
17 Act. 18 U.S.C. § 3161(h)(7)(A), (B)(iv).

18 IT IS SO ORDERED.

20 DATED: March __, 2020

HON. VIRGINIA K. DEMARCHI
United States Magistrate Judge